

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Montana

United States of America

v.

JUSTIN JOSE ROMO

Case No.

MJ-23-

-M-KLD

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2022 -September 2022 in the county of Flathead in the
 District of Montana, the defendant(s) violated:

Code Section

Offense Description

21 USC 841(a)(1)

Possession with intent to distribute methamphetamine

21 USC 846

Conspiracy to possess with intent to distribute methamphetamine

18 USC 924(c)(1)(A)(i)

Knowingly possessed, in and affecting interstate commerce, firearms and ammunition

This criminal complaint is based on these facts:

See attached affidavit

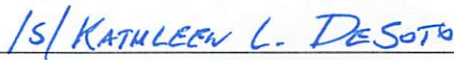
☒ Continued on the attached sheet.

Complainant's signature

Troy Capser, Special Agent

Printed name and title

Sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1
 by telephone.

Date: FEB 7, 2023

Judge's signature

City and state: Missoula, Montana

Kathleen L. DeSoto

Printed name and title

Affidavit in Support of Criminal Complaint

1. I, Troy M. Capser, hereafter referred to as your affiant, am a Special Agent with Department of Homeland Security, Homeland Security Investigations, being duly sworn, depose and state the following:
 - a. I am a Special Agent (SA) for the Department of Homeland Security, Homeland Security Investigations, hereafter referred to as HSI, and have been so employed since July of 2001. I am presently assigned to the Resident Agent in Charge (RAC) Kalispell, Montana, HSI office. In addition to my experience as an HSI Special Agent, I received a Bachelor's Degree from The University of Montana, Missoula, Montana. I have been involved in a number of investigations involving narcotics and have received training in this area. I have participated in numerous seizures of fentanyl as well as subsequent arrests, including the detection and recovery of fentanyl. I have also spoken with and been advised by other agents regarding narcotics investigations and their investigative techniques.
2. I make this affidavit in support of a criminal complaint charging Justin Jose Romo with knowingly and unlawfully possessing with intent to distribute fentanyl, and conspiring to do so, in violation of 21 U.S.C. §§ 841(a)(1);846 and 18 U.S.C. §§ 924(c)(1)(A)(i).

3. On or about July 5, 2022, Agents with the Northwest Montana Drug Task Force (NWDTF) received an anonymous tip that Justin Romo's supplier had recently arrived in Kalispell to bring illegal drugs to Romo for distribution.
4. Justin Romo is known to the NWDTF as being involved in the use, possession, and distribution of dangerous drugs in Northwest Montana. Agents have previously observed Romo driving a gray 2009 Audi A4 bearing MT Temporary Tag AALX6266. On July 7, 2022, I located the Audi at the Country Inn and Suites by Radisson in Kalispell on Highway 2.
5. I was conducting surveillance of the vehicle and observed a single male, fitting the description of Justin Romo, exit the hotel and get into the Audi A4. I continued surveillance of the vehicle as it traveled from the hotel to an apartment complex located at 1515 Montana Highway 35 in Kalispell. I know that Halle Reading resides at this apartment complex. The male matching Romo's description exited the Audi A4 and entered one of the apartments. Reading has been involved with several of my drug distribution investigations within the past year.
6. I observed Justin Romo and Halle Reading exit the apartment and get into the gray Audi and proceed westbound on MT Highway 35 towards Kalispell. Flathead County Deputy Matt Vander Ark conducted a traffic stop on the

vehicle at City Brew Coffee at the intersection of Highway 35 and Highway 2 in Kalispell.

7. Romo and Reading were both detained. Romo was arrested after his probation/parole officer requested his arrest for violating the conditions of his release from a previous offense. Romo was found to have \$4,993 in his pants pocket.
8. Agents applied for and were granted a Montana District Court Search Warrant for the Gray Audi bearing Montana Temporary Tag AALX6266, VIN # WAUSF78K69A093049.
9. Agents searched the Audi and located 32.5 grams of meth contained in a black box magnetically attached to the underside of the driver's seat. Additionally, agents found \$5,080 in currency consisting of only \$20 bills in a bag behind the driver's seat on the floor. Agents also located, 7.4 grams of fentanyl pills, a loaded semi-auto pistol and currency (U.S) in Halle Reading's purse which was located in the passenger area of the car.
10. Agents believe, based on recorded jail phone calls, forensic evidence from Romo's phone and other interviews that the pistol in Reading's purse belongs to Romo and he provided the gun to her when they were getting pulled over by deputies.

11. On September 26, 2022, NWDTF Agents Seth Stratton and Dustin Anderson interviewed a confidential source of information, hereafter referred to as the "CS". The CS has provided NWDTF Agents with accurate and reliable information involving other drug distribution investigations.
12. The CS stated CS was arrested after a traffic stop in April 2022 when police found three ounces of methamphetamine and 300 fentanyl pills in the vehicle. The CS advised Justin Romo gave CS the drugs to sell for Romo. After the CS was released from Jail, the CS along with others were dealing one (1) pound of methamphetamine and 100 fentanyl pills per week for Romo. The CS added they averaged this amount for a little over three months. The CS has personally seen approximately two pounds of methamphetamine and about 1000 fentanyl pills on Romo at one time.
13. The CS observed Romo with a gun and remembers him saying it was a .380 caliber pistol with a laser sight built in. The CS believes Romo said it was a Smith and Wesson. The handgun described by the CS seems to be identical to the handgun found in Haley Reading's purse while with Romo on the traffic stop that took place on July 7, 2022.
14. In September 2022, agents learned from several sources that Justin Romo had left Montana as he was anticipating being arrested by law enforcement for pending drug charges.

15. On September 29, 2022, a vehicle occupied by Hailey Bearrows, Jacqueline Cooper and Justin Romo was stopped for speeding near Winnemucca, Nevada. When officers identified Romo after receiving a fictitious name, Romo was arrested for an outstanding warrant.
16. A subsequent search of the vehicle yielded approximately 718 grams of methamphetamine and 400 grams of fentanyl concealed in a bag of dog food. Officers also located a firearm concealed in center console of the vehicle. Both Bearrows and Cooper were separately interviewed by law enforcement. Both Bearrows and Cooper provided information that appeared to correspond with the details of the investigation. Both females told investigators that Romo was in possession of the drugs, and he placed the drugs in a bag of dog food. Both females said Romo was in possession of the gun, and it was Romo that placed the gun under the cupholder of the vehicle.
17. Justin Romo has been incarcerated at the Humboldt County Detention Center in Winnemucca, NV since the September 29th traffic stop. I recently learned Romo has posted bond and is in the process of being released from custody. It is the believe of your affiant and other agents involved with the investigation that Justin Romo will attempt to flea from current and potential further criminal charges if he doesn't remain in custody.

18. Based on the above information, it is your affiant's belief probable cause exists to charge Justin Jose Romo with knowingly and unlawfully possessing fentanyl with the intent to distribute, and conspiring to do so, in violation of 21 U.S.C. §§ 841(a)(1); 846 and 18 U.S.C. §§ 924(c)(1)(A)(i).



Troy M. Capser, Special Agent
Homeland Security Investigations

Sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on February 7, 2023.

15/ KATHLEEN L. DeSoto
United States Magistrate Judge Kathleen L. DeSoto